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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2015 SEP 16 PM 12:37

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARKOZ LUNA,
aka Mark, aka King Dark (1),
MICHAEL LARA (2),
GISELA CISNEROS (3),

ALFREDO LOPEZ (5),

Defendants.

CRIMINAL NO. 15-1000

BY PROSECUTOR

INDICTMENT

[Vio. 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A) Conspiracy to Distribute and Possess with intent to Distribute 50 grams or more of Methamphetamine, a Schedule II Controlled Substance; Vio. 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. §2 Aiding and Abetting in the Possession with intent to Distribute 50 grams or more of Methamphetamine, Schedule II Controlled Substance; and Vio. 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) Possession with intent to Distribute Cocaine, Schedule II Controlled Substance].

THE GRAND JURY CHARGES:

SA 15 CR 0636 FB
COUNT ONE

[21 U.S.C. § 846 {21 U.S.C. §§841(a)(1) and 841(b)(1)}]

That beginning on or about September 22, 2014, the exact date unknown to the grand jurors, and continuing until and including, on or about November 28, 2014, in the Western District of Texas, and elsewhere Defendants,

MARKOZ LUNA (1),
MICHAEL LARA (2),
GISELA CISNEROS (3).

ALFREDO LOPEZ (5),

and others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess

with intent to distribute a mixture and substance containing a detectable amount of 50 grams or more of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1);

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing Methamphetamine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY	STATUTE
MARKOZ LUNA (1)	50 grams or more	21 U.S.C. § 841(b)(1)(A)
MICHAEL LARA (2)	50 grams or more	21 U.S.C. § 841(b)(1)(A)
GISELA CISNEROS (3)	50 grams or more	21 U.S.C. § 841(b)(1)(A)
ALFREDO LOPEZ (5)	50 grams or more	21 U.S.C. § 841(b)(1)(A)

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) and 18 U.S.C §2]

On or about November 28, 2014 in the Western District of Texas, Defendants,

**MARKOZ LUNA (1),
MICHAEL LARA (2) and
GISELA CISNEROS (3) and**

and others known and unknown to the Grand Jury, aided and abetted by each other, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT THREE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) and 18 U.S.C §2]

On or about October 10, 2014 in the Western District of Texas, Defendants,

MARKOZ LUNA (1),

ALFREDO LOPEZ (5) and

and others known and unknown to the Grand Jury, aided and abetted by each other, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) and 18 U.S.C §2]

On or about September 22, 2014 in the Western District of Texas, Defendants,

MARKOZ LUNA (1) and

and others known and unknown to the Grand Jury, aided and abetted by each other, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]

That on or about February 4, 2014, in the Western District of Texas, Defendant,

MARKOZ LUNA (1),

did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a mixture and substance containing a detectable amount of Cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT SIX

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]

That on or about March 8, 2013, in the Western District of Texas, Defendant,

MARKOZ LUNA (1),

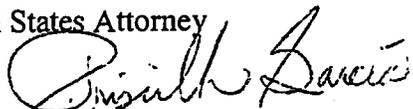
did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a mixture and substance containing a detectable amount of Cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

A TRUE BILL.


FOREPERSON

RICHARD L. DURBIN, JR.
United States Attorney

By:


PRISCILLA GARCÍA
Assistant United States Attorney